AMENDMENTS TO THE DRAWINGS:

The attached sheets of drawings include changes to Figures 4 and 5 to correct

overlapping lines and text.

Attachments: Replacement Sheets of Figs. 4 and 5

REMARKS

By the present amendment, Applicants have amended claims 1, 10, and 24 and added new claims 25-27. Claims 1-10 and 16-27 remain pending.

In the February 27, 2007 Office Action, the Examiner objected to the drawings because of overlapping lines and text in Figures 4 and 5 and rejected claims 1-10 and 16-24 under 35 U.S.C § 102(b) as being anticipated by U.S. Patent No. 6,058,413 to Flores ("*Flores*"). Applicants traverse the objection and the rejections.[1]

I.   Drawing Objections

The Examiner objected to the drawings under 37 CFR 1.121(d) because of overlapping lines and text in Figures 4 and 5. Accordingly, Applicants attach replacement drawing sheets of figures 4 and 5 and submit that the drawings now comply with 37 CFR 1.121(d). Therefore, Applicants respectfully request that the Examiner withdraw the objection to the drawings.

II.   Rejection under 35 U.S.C § 102

Applicants respectfully traverse the rejection of claims 1-10 and 16-24 under 35 U.S.C § 102(b) as being anticipated by *Flores*. In order to properly establish anticipation under 35 U.S.C. § 102, the Court of Appeals for the Federal Circuit has held

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[1] As Applicants' remarks with respect to the Examiner's rejections are sufficient to overcome these rejections, Applicants' silence as to certain assertions or requirements applicable to such rejections (e.g., whether a reference constitutes prior art, motivation to combine references, etc.) is not a concession by Applicants that such assertions are accurate or such requirements have been met, and Applicants reserve the right to analyze and dispute such in the future.

that "[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Furthermore, "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989). *See also* M.P.E.P. § 2131. Here, *Flores* does not disclose each and every element of Applicant's claimed invention.

For example, *Flores* fails to teach or suggest "producing at least one input data record... transforming the at least one input data record into an output data record designed for access by at least two business applications having different data requirements, wherein the output data record comprises a document including different data areas...and reading, by the at least two business applications, the different data areas in the output data record depending on the data requirements of the at least two business applications," as required by independent claim 1.

Flores appears to be directed to facilitating interaction between a workflow enabled application (WEA) and a workflow server. To do so, *Flores* "provides a standard transaction format (STF) for accessing such a workflow system through STF processors..." (*Flores*, Abstract). The WEA sends a workflow transaction in STF format to an STF processor. (*Flores*, column 8, lines 37-42). From there, "STF transactions are passed from the STF processor to the workflow server via calls to the transactions API." (*Flores*, column 8, lines 42-44). Essentially, the "STF processors map and translate between a workflow-enabled application's [WEA's] data format and the data elements of the workflow system APIs." (*Flores*, column 7, lines 27-31).

The Examiner appears to allege that the "STF Transaction" and "Workflow Server API" (see *Flores*, Figure 5), as described above, constitute the claimed "at least one input data record" and "output data record," respectively. Applicants respectfully disagree.

The Workflow Server API from *Flores* cannot constitute the claimed "output data record [that] comprises a document with different data areas," as required by independent claim 1. Instead, the Workflow Server APIs are <u>function calls</u> that are made from the STF processors to the workflow servers (see *Flores*, column 10, lines 1-25). These function calls therefore cannot constitute the claimed "output data <u>record</u>," much less could the function call constitute a "document with different data areas" as required by independent claim 1.

Further, the Workflow Server API (the alleged "output data record") cannot be read "by the at least <u>two business applications</u>," as required by independent claim 1 (emphasis added). Instead, the API function calls that the STF processor makes (the alleged "output data record") are only sent to the Workflow Server in *Flores*. Therefore, there can be no "reading, by the at least two business applications, [of] the different data areas in the output data record <u>depending on the data requirements of the at least two business applications</u>," as required by independent claim 1. In fact, *Flores* is completely silent with respect to "at least two business applications," as claimed.

Independent claims 10 and 24, although different in scope, contain elements similar to those noted above with respect to claim 1. As mentioned previously, *Flores* fails to teach each and every element of claim 1. Therefore, *Flores* fails to teach each and every element of claims 10 and 24, for similar reasons. Accordingly, for at least the

above reasons, the Examiner should withdraw the rejection of claims 10 and 24 under

35 U.S.C § 102(b).

Dependent claims 2-9 and 16-23 depend from independent claims 1, 10 or 24

and, therefore, require all elements thereof. As noted above, *Flores* fails to teach each

and every element of claims 1, 10 and 24. Therefore, *Flores* fails to teach each and

every element of claims 2-9 and 16-23 at least due to their dependence. Accordingly,

for at least this reason, the Examiner should withdraw the rejection of claims 2-9 and

16-23 under 35 U.S.C § 102(b)..

New claims 25-27 depend from independent claim 1, 10, and 24 respectively.

Accordingly, claims 25-27 are allowable over *Flores* at least due to their dependence.

CONCLUSION

In view of the foregoing amendments and remarks, Applicant respectfully

requests reconsideration and reexamination of this application and the timely allowance

of the pending claims.

Please grant any extensions of time required to enter this response and charge

any additional required fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Dated: May 29, 2007   By:_____ - Reg. No. 53,232

for   C. Gregory Gramenopoulos
Reg. No. 36,532

Attachments: **Replacement Drawing Sheets Figs. 4 and 5**